

# EXHIBIT A

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Attorneys for Plaintiff Avtech Capital, LLC

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**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF UTAH, CENTRAL DIVISION**

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AVTECH CAPITAL, LLC, a Utah limited  
liability company,

Plaintiff,

v.

C & G ENGINES CORP., a Florida  
Corporation, GABRIEL ANGULO, a citizen  
of Florida, CG MIAMI NDT, LLC, a Florida  
limited liability company, JOSE PEREZ, a  
citizen of Florida, JESUS ROJAS, a citizen of  
Florida,

Defendants.

**DECLARATION OF CHRIS SCHARMAN  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT  
AND DEFAULT JUDGMENT**

Civil No. 2:19-cv-00541-JNP-DAO

Judge Jill N. Parrish

Magistrate Judge Daphne A. Oberg

I, Christopher Scharman, declare as follows:

1. I am over the age of eighteen and have personal knowledge and am competent to testify regarding the matters set forth herein.

2. I am President and Chief Executive Officer for Avtech Capital, LLC ("Avtech").

I have personal knowledge of the facts stated in this Declaration.

3. Avtech is an equipment leasing company.

4. Avtech entered a Master Lease Agreement No. TFG/CG 2576, dated November 6, 2015 with Defendant C & G Engines Corp. (“C & G”) as Lessee (the “Master Lease”) under its former name, Tetra Financial Group, LLC. A true and accurate copy of the Master Lease is attached to Plaintiff’s Motion for Partial Summary Judgment and Default Judgment as Exhibit B.

5. Avtech paid a total of \$990,000.00 to purchase the Leased Property so that Avtech could lease the Leased Property to C & G.

6. C & G failed to make all of the payments due under the Master Lease. Specifically, C & G only made forty of the required forty-eight Base Term payments.

7. Defendant failed to make the payment due on June 1, 2019 and every payment thereafter.

8. Defendants Gabriel Angulo, CG Miami NDT, LLC, and Jesus Rojas failed to make payments in C & G’s stead when C & G failed to make payments.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on October 15, 2020

/s/ Christopher Scharman\*  
Christopher Scharman

\*Signature affixed electronically with express permission